

STATE of CALIFORNIA, COUNTY of TULARE,
SEARCH WARRANT and AFFIDAVIT
(AFFIDAVIT)

SW NO. _____ Location: Tulare

Time: 1:55 PM

Date: 8/22/18

Booker, J. Aguirre

Your Affiant Rodney Klassen swears under oath that the facts expressed by him in the attached and incorporated Statement of Probable Cause are true and that based thereon he has probable cause to believe and does believe that the articles, property, and persons described below are lawfully seizable pursuant to Penal Code Section 1524 et seq., as indicated below, and are now located at the locations set forth below. Wherefore, Affiant requests that this Search Warrant be issued.


(Signature of Affiant)

ORDER TO SEAL REQUESTED: ☒ YES ☐ NO
NIGHT SEARCH REQUESTED: ☐ YES ☒ NO

(SEARCH WARRANT)

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY PEACE OFFICER IN THE COUNTY OF TULARE: proof by affidavit, having been this day made before me by Peace Officer Rodney Klassen that there is probable cause to believe that the property or person described herein may be found at the location(s) set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524 et seq., as indicated below by "X"(s), in that:

- ☒ property was stolen or embezzled;
- ☒ property or things were used as the means of committing a felony;
- ☐ property or things are in the possession of any person with the intent to use them as a means of committing a public offense, or in the possession of another to whom he or she may have delivered them for the purpose of concealing them or preventing their being discovered;
- ☒ property or things to be seized consist of any item or constitute any evidence that tends to show a felony has been committed, or tends to show that a particular person has committed a felony;

You are Therefore **COMMANDED to SEARCH:** (premises, vehicles, persons)

Chase Bank 1079 E Prosperity Ave, Tulare, CA 93274, further described as a brick and wood sided structure, tan in color, with the Chase bank emblem clearly visible to the public.

For the **FOLLOWING PROPERTY, THING(s) or PERSON(s):**

Evidence of criminal activity related to this investigation described further in Attachment A.

AND TO SEIZE IT / THEM IF FOUND and bring it / them forthwith before me, or this court, at the courthouse of this court. This Search Warrant and Affidavit and attached and incorporated Statement of Probable Cause were sworn to as true and subscribed before me on this 22nd day of August, 2018, at 1:30 A.M. (P.M.) Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.


(Signature of Magistrate)

ORDER TO SEAL APPROVED: ☒ YES ☐ NO
NIGHT SEARCH APPROVED: ☐ YES ☒ NO

Judge of the Superior Court of California, County of Tulare

John P. Bianco

John P. Bianco
(Magistrate's Printed Name)



STATEMENT of PROBABLE CAUSE

TCDA BOI case 17-01-000407

Attachment A

Items to be searched for

Items to be searched for shall include, but not be limited to, evidence as it relates to this investigation and the allegations of embezzlement and misappropriation of funds and/or property, California Penal Code section 503 – 515, a felony; misappropriation of public funds, California Penal Code section 424(a)1, a felony; procure an unlawful loan, California Penal Code section 424(a)2, a felony; false account, entry, or erasure, California Penal Code section 424(a)3, a felony; fraudulently altering accounts, California Penal Code section 424(a)4, a felony; unlawful willful refusal to pay, California Penal Code section 424(a)5, a felony; unlawful willful refusal to transfer public funds, California Penal Code section 424(a)6, a felony; unlawful willful refusal to pay or transfer public funds to an officer, California Penal Code section 424(a)7, a felony; misappropriation of public funds, California Penal Code section 485, a felony; theft of money/property under false pretense, California Penal Code section 487(a), a felony; money laundering, California Penal Code section 186.10, a felony; conspiracy to defraud, California Penal Code section 182, a felony; conflict of interest GC 1090; knowingly present false documents for financial gain, California Penal Code section 532(a), a misdemeanor; knowingly influence a government official for financial gain, Government Code section 87100, a felony.

JP Morgan Chase bank is ordered to freeze all assets and account activity for the following accounts:

1. Account # [REDACTED] 5915 (Tulare Asset Management, LLC)
2. Account # [REDACTED] 8699 (Healthcare Conglomerate Associates, LLC)
3. Account # [REDACTED] 5000 (Healthcare Conglomerate Associates, LLC)
4. Account # [REDACTED] 3432 (Yorai & Amy Benzeevi)

STATEMENT of PROBABLE CAUSE

TCDA BOI case 17-01-000407

1 If any proceeds, cash, negotiable instruments, or any money is on
2 deposit or present in the account(s) it may be frozen and held by the
3 Custodian of Records, JP Morgan Chase Bank, pursuant to PC 1409
4 (Property in Custody of Magistrate) and PC 1410 (Return to owner by court)
5 and held in an interest bearing account until those funds have been released to
6 the appropriate party as directed by the Tulare County Superior Court.
7 Notification of release will be through the investigating agency, the Tulare County
8 District Attorney's Office, Bureau of Investigations.